

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

In the Matter of the Application of

TRUMP VILLAGE SECTION 4, INC.

Petitioner,

**NOTICE OF PETITION TO
STAY ARBITRATION**

For a judgment to stay the arbitration
commenced by

LOCAL 804 INTERNATIONAL BROTHERHOOD OF
TEAMSTERS

Civil Action No. _____

Respondents.

MOTION BY:

Daniel Murphy, Esq., on behalf of Petitioner, Trump
Village Section 4, Inc.

PLACE, DATE & TIME:

On July ___, 2022 or as soon thereafter as counsel may be
heard at the United States District Court, Eastern District of
New York, 225 Cadman Plaza East, Brooklyn, New York
11201.

SUPPORTING PAPERS:

Verified Petition to Stay Arbitration, dated July 5, 2022;
Affidavit of Igor Oberman, sworn to July 5, 2022;
Memorandum of Law in Support of Verified Petition to
Stay Arbitration, dated July 5, 2022.

RELIEF REQUESTED:

An Order granting the following relief: (a) stay of
arbitration improperly demanded by Respondents pursuant
to 9 U.S.C. § 1 *et seq.*; and (b) for such other and further
relief as the Court may deem just and proper.

BASIS FOR RELIEF
REQUESTED:

9 U.S.C. § 1, *et seq.* and 29 U.S.C. § 185.

RESPONDING PAPERS: Petitioner intends to file and serve reply papers. Therefore, Respondents are required to serve and file opposing papers at least eight (8) business days prior to the return date.

DATED: New York, New York
July 5, 2022

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

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